



Registered Importer R-00-214  
1092 Jupiter Park Lane  
Suite 140  
Jupiter, FL 33458

**May 10, 2002**

Administrator  
O.V.S.C.  
National Highway Traffic Safety Administration  
Room 6111  
400 7<sup>th</sup> St., S.W.  
Washington, D.C. 20590

Dear Sir or Madam,

I am writing to you regarding the Petition for Decision that Nonconforming 2001-2002 Mercedes Benz SL (Body 230) Passenger Cars are eligible for Importation, filed by J.K. Technologies, L.L.C. Docket No. NHTSA-2002-11846.

I have two concerns regarding this document:

Firstly, the petition contains numerous technical inaccuracies.

Secondly, I am confused about whether or not I should share my comments; make corrections, etc., because of the fact that the Petitioner has requested confidentiality.

It has always been my understanding that substantially similar cars fell exclusively into the VSP category, and that all the technical changes and modifications then became public knowledge. Confidentiality only came into play when applying for VSA numbers.

In recent months, DOT's legal department and certain Petitioners appear to have blurred the distinction between the two. As we have in the past, we are willing to abide by the rules provided they are well defined. This new phenomenon of requesting confidentiality on substantially similar cars has changed many things and brought about many questions.

A few questions that come to mind are:

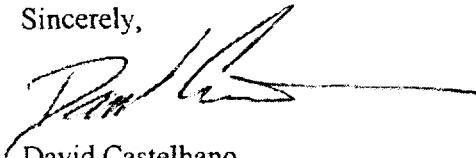
Should this company file its' own petition for separate review?

Will each Petitioner be granted his or her own VSP number?

Will this company's comment further another party's cause only to be excluded later on?

This company respectfully requests that DOT legal publicly outline its criteria for granting confidentiality along with the legal reasoning behind their position. Once this is accomplished, we are willing to document the flaws in this petition publicly and are prepared to do so.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Castelhana', followed by a horizontal line.

David Castelhana  
President

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